

Hon. Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AFSHAN KHOSRAVI, *et al.*,

Plaintiffs,

v.

ANTONY J. BLINKEN, *et al.*,

Defendants.

No. 2:24-cv-1227-BJR

SECOND AMENDED STIPULATED
MOTION AND BRIEFING SCHEDULE

The parties, through counsel of record, present this Court with this second amended proposed schedule for briefing Defendants' motion to dismiss and Plaintiffs' motion for summary judgment. Plaintiffs bring this litigation pursuant to the Administrative Procedure Act and the Mandamus Act seeking to compel Defendants to complete processing of Plaintiff Khosravi's immigrant visa application that a consular officer refused on November 3, 2023, pursuant to 8 U.S.C. § 1201(g). The parties disagree as to whether Defendants have a further mandatory duty concerning the visa application and, if so, whether that alleged duty has been unreasonably delayed.

The plaintiffs filed the amended complaint on November 5, 2024, and on December 3, 2024, this Court approved the amended stipulated motion and [proposed] briefing schedule. Dkt. 11.

The parties were allowed to reserve the right to change the schedule prior to 12-09-2024, and now are doing so. For good cause, the parties are seeking a one week extension of the deadlines. Scheduling conflicts have arisen due to current cross-response deadline falling during the Christmas to the New Years vacation period. The parties believe that this short extension will resolve these conflicts.

The parties propose the following second amended briefing schedule:

<u>Filing</u>	<u>Deadline</u>
Defendants' Motion to Dismiss	December 16, 2024
Plaintiffs' Motion for Summary Judgment	December 16, 2024
Defendants' Response to Plaintiffs' Motion for Summary Judgment	January 06, 2025
Plaintiffs' Response to Defendants' Motion to Dismiss	January 06, 2025
Defendants' Reply in Support of the Motion to Dismiss	January 20, 2025
Plaintiffs' Reply in Support of the Motion for Summary Judgment	January 20, 2025

The parties request that the Court enter the above-proposed second amended briefing schedule.

Dated: December 6, 2024

Respectfully submitted,

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s/Michelle R. Lambert
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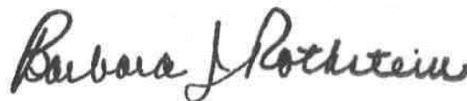
*I certify that this memorandum contains 468 words,
in compliance with the Local Civil Rules.*

[PROPOSED] ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall submit their cross-motions pursuant to the following amended schedule:

<u>Filing</u>	<u>Deadline</u>
Defendants' Motion to Dismiss	December 16, 2024
Plaintiffs' Motion for Summary Judgment	December 16, 2024
Defendants' Response to Plaintiffs' Motion for Summary Judgment	January 06, 2025
Plaintiffs' Response to Defendants' Motion to Dismiss	January 06, 2025
Defendants' Reply in Support of the Motion to Dismiss	January 20, 2025
Plaintiffs' Reply in Support of the Motion for Summary Judgment	January 20, 2025

Dated this 11th of December, 2024.



Barbara Jacobs Rothstein
U.S. District Court Judge